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*Bunga Bunga LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

LUIS PONCE, an individual, and ON  
BEHALF OF OTHERS SIMILARLY  
SITUATED,

Plaintiffs,

vs.

BUNGA BUNGA LLC, a domestic limited-  
liability company,

Defendant.

Case No. 2:19-cv-02002-KJD-VCF

**STIPULATION TO EXTEND  
DEADLINE FOR DEFENDANT TO  
RESPOND TO PLAINTIFFS'  
COMPLAINT**

**(FOURTH REQUEST)**

IT IS HEREBY STIPULATED by and between Plaintiff Luis Ponce ("Plaintiff"), through his counsel Lagomarsino Law, and Defendant Bunga Bunga LLC ("Defendant"), through its counsel Jackson Lewis P.C., that Defendant shall have a three-week extension up to and including Friday, April 3, 2020, in which to file a response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. Defendant's response to the Complaint is currently due on Friday, March 13, 2020.
2. The Parties are actively engaged in settlement negotiations of this class action case. The Parties have conducted necessary analysis in order to meaningfully discuss settlement and to exchange settlement offers. The Parties are continuing to negotiate and exchanging settlement offers. The Parties believe a settlement in this case can be reached with sufficient time to conclude the negotiations. In the interest of avoiding litigation and unnecessary expenditure of

resources, the parties are requesting a three-week extension of the deadline for Defendant to respond to the Complaint.

3. This is the fourth request for an extension of time for Defendant to file a response to Plaintiff's Complaint.

4. This request is made in good faith and not for the purpose of delay.

5. Nothing in this Stipulation, nor the fact of entering into the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 12th day of March, 2020.

LAGOMARSINO LAW

JACKSON LEWIS P.C.

s/ Andre M. Lagomarsino

s/ Daniel I. Aquino

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*Attorney for Plaintiff*

*Attorneys for Defendant*

**ORDER**

IT IS SO ORDERED:



United States Magistrate Judge

3-13-2020

Dated: \_\_\_\_\_